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May 26, 2022

Hon. Katherine Polk Failla  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Request for Extension of Time to Serve  
Request to Reschedule Initial Conference Scheduled May 31<sup>st</sup>, 2022  
Re: *Larball Publishing Company, et al. v. Dua Lipa, et al.*, 22-cv-1872**

Dear Judge Failla,

Plaintiffs Larball Publishing Company, Inc. and Sandy Linzer Productions, Inc. respectfully request additional time to complete service of summons on Defendants in this action and to reschedule the initial conference until defense counsel officially appears. The current deadline for service is June 2, 2022. Plaintiffs request an extension of time to serve, up to and including **August 2, 2022**.

This request for extension is made in good faith and does not prejudice Defendants. Plaintiffs made timely efforts to obtain waivers of service from Defendants. Plaintiffs can make a more detailed showing if the Court desires, but as of this writing Plaintiffs have been emailing a new defense firm (cc'd on this writing), who indicated they are in the process of obtaining permission to accept the waivers of service. Prior defense counsel had already agreed in writing to accept the waivers on behalf of some of the Defendants, and plaintiffs attempted to serve others, so we are hopeful the issue of waivers will be worked out and if not, we will go through the process of serving.

Also, we respectfully request a postponement of the initial conference until defense counsel appears, as requested by the new defense firm.

We respectfully thank the Court for consideration of these requests and can furnish additional documentation and information if needed. Thank you.

BROWN, LLC

/s/ Jason T. Brown  
Jason T. Brown

cc: Ms. Christine Lepera, Esquire